### UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

N 03 06 2018
589881
SECRETARY

In the Matter of

BENCO DENTAL SUPPLY CO., a corporation,

HENRY SCHEIN, INC., a corporation, and

PATTERSON COMPANIES, INC., a corporation.

ORIGINAL

Docket No. 9379

**PUBLIC** 

## ANSWER OF RESPONDENT PATTERSON COMPANIES, INC. TO THE FEDERAL TRADE COMMISSION'S ADMINISTRATIVE COMPLAINT

Respondent Patterson Companies, Inc. ("Patterson"), through its undersigned counsel, answers the Administrative Complaint ("Complaint") filed by the Federal Trade Commission ("FTC") as follows. Pursuant to 16 C.F.R. § 3.12, except to the extent specifically admitted herein, Patterson denies each and every allegation contained in the Complaint, including all allegations contained in headings or otherwise not contained in one of the Complaint's 90 numbered paragraphs. Specifically, Patterson denies that it has engaged in conduct that violates Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, and denies that this proceeding is in the public interest.

- 1. Patterson denies the allegations of Paragraph 1 of the Complaint.
- 2. Patterson denies the allegations in the first sentence of Paragraph 2 of the Complaint. Patterson admits the allegations contained in the second and third sentences of Paragraph 2 of the Complaint, and denies each and every remaining allegation in Paragraph 2.
- 3. The allegations of Paragraph 3 of the Complaint relate to parties other than Patterson, thus no response is required. To the extent required, Patterson admits that collections of dentists which it understands to be labeled "buying groups" and "cooperatives" have

historically not been common in the dental products industry, and denies the remaining allegations in Paragraph 3 of the Complaint.

- 4. The allegations of Paragraph 4 of the Complaint relate to parties other than Patterson, thus no response is required. To the extent required, Patterson denies the allegations of Paragraph 4 of the Complaint.
- 5. Patterson denies the allegations of Paragraph 5 of the Complaint relating to Patterson. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 5 of the Complaint relating to other parties.
- 6. Patterson denies the allegations of Paragraph 6 of the Complaint relating to Patterson. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 6 of the Complaint relating to other parties.
- 7. Patterson denies the allegations of Paragraph 7 of the Complaint relating to Patterson. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 7 of the Complaint relating to other parties.
  - 8. Patterson denies the allegations of Paragraph 8 of the Complaint.
- 9. Patterson denies the allegations of Paragraph 9 of the Complaint, and states that at all times it has decided independently on how to respond to inquiries from groups labelled as "buying groups."
  - 10. Patterson denies the allegations of Paragraph 10 of the Complaint.
- 11. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 11 of the Complaint, which concern Respondent Benco and a third-party Burkhart, and therefore denies them.
  - 12. Patterson denies the allegations of Paragraph 12 of the Complaint.
- 13. On information and belief, Patterson admits the allegations contained in the first sentence of Paragraph 13 of the Complaint, and that Benco sells dental supplies, equipment, and services to dental practitioners in the United States. Patterson otherwise lacks sufficient information to admit or deny the allegations of Paragraph 13 of the Complaint regarding Benco. To the extent the allegations are legal conclusions, no response is required.
- 14. On information and belief, Patterson admits the allegations contained in the first sentence of Paragraph 14 of the Complaint, and that Schein sells dental supplies, equipment, and services to dental practitioners in the United States. Patterson otherwise lacks sufficient information to admit or deny the allegations of Paragraph 14 of the Complaint regarding Schein. To the extent the allegations are legal conclusions, no response is required.
- 15. Patterson admits it is a publicly traded corporation organized, existing, and doing business under the laws of the State of Minnesota, with its principal place of business at 1031 Mendota Heights Road, St. Paul, Minnesota 55120. Patterson further admits it sells dental

supplies, equipment, and services to dental practitioners in the United States. Patterson lacks sufficient information to admit or deny the remaining allegations of Paragraph 15 of the Complaint, and therefore denies them. To the extent the allegations are legal conclusions, no response is required.

- 16. Patterson admits it is a corporation as defined in 15 U.S.C. § 44, and lacks sufficient information to admit or deny the allegations of Paragraph 16 of the Complaint relating to other Respondents. To the extent the allegations are legal conclusions, no response is required.
- 17. Patterson admits it engages in commerce in the United States as defined in 15 U.S.C. § 44, and lacks sufficient information to admit or deny the allegations of Paragraph 17 of the Complaint relating to other Respondents. To the extent the allegations are legal conclusions, no response is required.
- 18. Patterson admits the allegations contained in the second and third sentences of Paragraph 18 of the Complaint, and lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations contained in the first sentence of Paragraph 18, and therefore denies them.
- 19. Patterson denies that "the cost of dental products is a substantial component of the expenditures of independent dental practices" and admits the remainder of the allegations contained in paragraph 19 of the Complaint.
- 20. The allegations of Paragraph 20 of the Complaint are legal conclusions to which no response is required. To the extent a response is required, Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations contained in Paragraph 20 of the Complaint, and therefore denies them.
- 21. Patterson admits that full service distributors can provide value to purchasers and denies the remaining allegations of Paragraph 21 of the Complaint.
- 22. Patterson denies the allegations of Paragraph 22 of the Complaint. To the extent the allegations contained in Paragraph 22 of the Complaint are legal conclusions, no response is required.
- 23. Patterson denies the allegations of Paragraph 23 of the Complaint. To the extent the allegations contained in Paragraph 23 of the Complaint are legal conclusions, no response is required.
- 24. To the extent the allegations contained in Paragraph 24 of the Complaint are legal conclusions, no response is required. Patterson admits the allegations contained in the second and third sentences of Paragraph 24 of the Complaint, and denies the remaining allegations contained in Paragraph 24.
- 25. To the extent the allegations contained in Paragraph 25 of the Complaint are legal conclusions, no response is required. Patterson admits the allegations contained in the last sentence of Paragraph 25 of the Complaint. Patterson admits that mail-order and internet

distributors do not provide the breadth of services available through Patterson, and denies the remaining allegations contained in Paragraph 25.

- 26. To the extent the allegations contained in Paragraph 26 of the Complaint are legal conclusions, no response is required. Patterson denies the allegations of Paragraph 26 of the Complaint.
- 27. To the extent the allegations are legal conclusions, no response is required. Patterson denies the allegations of Paragraph 27 of the Complaint.
- 28. To the extent the allegations contained in Paragraph 28 of the Complaint are legal conclusions, no response is required. Patterson admits that it competes with other distributors for the sale of dental products and services to independent dentists. Patterson admits that some dentists cannot store and manage large quantities of supplies in-house and that some dentists require prompt equipment servicing. Patterson denies that buying groups' members purchase products throughout the United States, and lacks knowledge sufficient to admit or deny the remaining allegations of Paragraph 28 of the Complaint.
  - 29. Patterson denies the allegations of Paragraph 29 of the Complaint.
- 30. Patterson denies the allegations of Paragraph 30 of the Complaint. To the extent the allegations contained in Paragraph 30 of the Complaint are legal conclusions, no response is required.
  - 31. Patterson denies the allegations of Paragraph 31 of the Complaint.
- 32. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 32 of the Complaint, and therefore denies them.
- 33. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 33 of the Complaint, and therefore denies them.
- 34. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 34 of the Complaint, and therefore denies them.
- 35. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 35 of the Complaint, and therefore denies them.
  - 36. Patterson denies the allegations contained in Paragraph 36 of the Complaint.
- 37. Patterson admits that the Complaint quotes a segment of an email. Patterson denies the remaining allegations of Paragraph 37 of the Complaint.
- 38. Patterson lacks knowledge concerning Benco's "policies" and denies the allegations contained in Paragraph 38 of the Complaint.

PUBLIC

- 39. Patterson admits that Paragraph 39 of the Complaint quotes a segment of an email and that the email was forwarded to the two individuals described. Patterson denies the remaining allegations of Paragraph 39 of the Complaint.
  - 40. Patterson denies the allegations contained in Paragraph 40 of the Complaint.
- 41. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 41 of the Complaint, and therefore denies them.
- 42. Patterson denies the allegations contained in Paragraph 42 of the Complaint directed at or involving Patterson. Paterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 42 directed at other Respondents, and therefore denies them.
- 43. Patterson states that Paragraph 43 accurately quotes a portion of an email and accurately states the date on which it was sent, the sender, and the recipient. Patterson denies all remaining allegations contained in Paragraph 43 of the Complaint.
  - 44. Patterson denies the allegations contained in Paragraph 44 of the Complaint.
- 45. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 45 of the Complaint, and therefore denies them.
- 46. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 46 of the Complaint, and therefore denies them.
- 47. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 47 of the Complaint, and therefore denies them.
- 48. Patterson states that Paragraph 48 accurately quotes a portion of an email and accurately states the date on which it was sent, the sender, and the recipient. Patterson denies all remaining allegations contained in Paragraph 48 of the Complaint.
- 49. Patterson states that Paragraph 49 accurately quotes a portion of two emails, and accurately states the date on which they were sent, the senders, and the recipients. Patterson denies all remaining allegations contained in Paragraph 49 of the Complaint.
- 50. Patterson admits that it competed for the business of dentists listed as members of this group at the individual dentist level, and denies all remaining allegations contained in Paragraph 50 of the Complaint.
- 51. Patterson states that Paragraph 51 accurately quotes a portion of two emails and accurately states the date on which they were sent, the senders, and the recipients. Patterson admits that in 2013 some entities labelled as "buying groups" contacted Patterson, and denies all remaining allegations of Paragraph 51 of the Complaint.
  - 52. Patterson denies the allegations of Paragraph 52 of the Complaint.

- 53. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 53 of the Complaint, and therefore denies them.
- 54. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 54 of the Complaint, and therefore denies them.
- 55. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 55 of the Complaint, and therefore denies them.
- 56. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 56 of the Complaint, and therefore denies them.
- 57. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 57 of the Complaint, and therefore denies them.
- 58. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 58 of the Complaint, and therefore denies them.
- 59. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 59 of the Complaint, and therefore denies them.
- 60. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 60 of the Complaint, and therefore denies them.
  - 61. Patterson denies the allegations of Paragraph 61 of the Complaint.
- 62. Patterson admits that Paragraph 62 of the Complaint accurately quotes one sentence of a text message written by a Patterson executive and produced in this matter, and denies the remaining allegations of Paragraph 62 of the Complaint.
- 63. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 63 of the Complaint, and therefore denies them.
- 64. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 64 of the Complaint, and therefore denies them.
  - 65. Patterson denies the allegations of Paragraph 65 of the Complaint.
- 66. Patterson denies the allegations of Paragraph 66 of the Complaint relating to Patterson and specifically denies entering into an agreement. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the remaining allegations contained in Paragraph 66 of the Complaint relating to other Respondents, and therefore denies them.
  - Patterson denies the allegations of Paragraph 67 of the Complaint.
  - 68. Patterson admits the allegations of Paragraph 68 of the Complaint.

- 69. Patterson admits that in October 2013 the TDA launched a program called "TDA Perks Supplies" that was directly competitive with Patterson and utilized an online entity called SourceOne, which sources its products primarily from other distributors, and that TDA Perks Supplies represented that it would provide discounts to its members. Patterson denies that TDA Perks Supplies was a "buying group" under any definition that Patterson is aware of, and denies all remaining allegations contained in Paragraph 69 of the Complaint.
- 70. Patterson denies the allegations of Paragraph 70 to the extent they relate to Patterson and lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the remaining allegations in Paragraph 70 of the Complaint, and therefore denies them.
  - 71. Patterson denies the allegations of Paragraph 71 of the Complaint.
- (a) Patterson denies the allegations in contained in Paragraph 71(a) of the Complaint relating to Patterson, and specifically denies that Benco's regional manager communicated with Patterson's regional manager to discuss withdrawing from the TDA Trade Show. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the remaining allegations contained in Paragraph 71(a) of the Complaint relating to other Respondents, and therefore denies them.
- (b) Patterson admits that a Schein Regional manager in Texas visited a Patterson branch manager and denies the remaining allegations in Paragraph 71(b) of the Complaint relating to Patterson. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the remaining allegations in Paragraph 71(b) of the Complaint relating to other Respondents, and therefore denies them.
- (c) Patterson admits that there was a phone call in January 2014 between Patterson and Schein in which TDA was mentioned, and admits that Paragraph 71(c) accurately quotes part of an email and accurately states the date on which it was sent, the sender, and the recipient. Patterson denies the remaining allegations contained in Paragraph 71(c) of the Complaint.
- (d) Patterson admits that Paragraph 71(d) of the Complaint accurately quotes an email and accurately states the date on which it was sent, the sender, and the recipient.
- 72. Patterson admits that it informed the TDA on December 18, 2013 that it would not attend the 2014 TDA Annual Meeting and that it, and on information and belief, Benco and Schein, did not attend the 2014 TDA Annual Meeting. Patterson lacks knowledge sufficient to form a reasonable belief to admit or deny the remaining allegations contained in Paragraph 72 of the Complaint, and therefore denies them.
- 73. Patterson admits that the partial quotation contained in Paragraph 73 is accurate, admits that it, and on information and belief, Benco and Schein, did not attend the 2015 Western Regional Dental Convention, and denies the remaining allegations contained in Paragraph 73 of the Complaint.
- 74. Patterson denies the allegations of Paragraph 74 of the Complaint. To the extent the allegations contained in Paragraph 74 of the Complaint are legal conclusions, no response is required.

- 75. Patterson denies the allegations of Paragraph 75 of the Complaint, and each of its subparts. To the extent the allegations contained in Paragraph 75 of the Complaint are legal conclusions, no response is required.
- 76. Patterson denies the allegations of Paragraph 76 of the Complaint. To the extent the allegations contained in Paragraph 76 of the Complaint are legal conclusions, no response is required.
- 77. Patterson denies the allegations of Paragraph 77 of the Complaint. To the extent the allegations contained in Paragraph 77 of the Complaint are legal conclusions, no response is required.
- 78. Patterson denies the allegations of Paragraph 78 of the Complaint. To the extent the allegations contained in Paragraph 78 of the Complaint are legal conclusions, no response is required.
- 79. Patterson denies the allegations of Paragraph 79 of the Complaint. To the extent the allegations contained in Paragraph 79 of the Complaint are legal conclusions, no response is required.
- 80. Patterson repeats and realleges its responses to Paragraphs 1 through 21 and 31 through 74 as its response to Paragraph 80 of the Complaint.
- 81. Patterson denies the allegations of Paragraph 81 of the Complaint. To the extent the allegations contained in Paragraph 81 of the Complaint are legal conclusions, no response is required.
- 82. Patterson denies the allegations of Paragraph 82 of the Complaint. To the extent the allegations contained in Paragraph 82 of the Complaint are legal conclusions, no response is required.
- 83. Patterson repeats and realleges its responses to Paragraphs 1 through 79 as its response to Paragraph 83 of the Complaint.
- 84. Patterson denies the allegations of Paragraph 84 of the Complaint. To the extent the allegations contained in Paragraph 84 of the Complaint are legal conclusions, no response is required.
- 85. Patterson denies the allegations of Paragraph 85 of the Complaint. To the extent the allegations contained in Paragraph 85 of the Complaint are legal conclusions, no response is required.
- 86. Patterson repeats and realleges its responses to Paragraphs 1 through 79 as its response to Paragraph 86 of the Complaint.
- 87. Patterson denies the allegations of Paragraph 87 of the Complaint. To the extent the allegations contained in Paragraph 87 of the Complaint are legal conclusions, no response is required.

- 88. Patterson denies the allegations of Paragraph 88 of the Complaint. To the extent the allegations contained in Paragraph 88 of the Complaint are legal conclusions, no response is required.
- 89. The allegations of Paragraphs 89 and 90, and Count 4 of the Complaint, do not allege any conduct by Patterson and thus no response is required. To the extent a response is required, Patterson denies the allegations of Paragraphs 89 and 90 of the Complaint.

### AFFIRMATIVE DEFENSES

- 1. The Complaint fails to state a claim upon which relief can be granted under Section 5 of the FTC Act, 15 U.S.C. § 45.
- 2. Neither the filing of this administrative action nor the contemplated relief are in the public interest, pursuant to 15 U.S.C. § 45.
- 3. The causes of action alleged in the Complaint are barred by mootness on their face because the Complaint alleges that the alleged conduct terminated more than two years ago, and fails to allege any likelihood of reoccurrence.
  - 4. Patterson reserves the right to assert other defenses as discovery proceeds.

Patterson respectfully requests that the Administrative Law Judge (i) deny the FTC's contemplated relief, (ii) dismiss the Complaint in its entirety with prejudice, (iii) award Patterson its costs of suit, and (iv) award such other and further relief as the Administrative Law Judge may deem proper.

Dated: March 6, 2018

/s/ James J. Long

James J. Long

Jay W. Schlosser

Briggs and Morgan, P.A.

80 South Eighth Street, Suite 2200

Minneapolis, MN 55402

Tele: (612) 977-8582

Email: jlong@briggs.com

Email: jschlosser@briggs.com

Joseph A. Ostoyich

William C. Lavery

Baker Botts L.L.P.

1299 Pennsylvania Avenue NW

Washington, DC 20004

Tele: (202) 639-7905

Email: joseph.ostoyich@bakerbotts.com Email: william.lavery@bakerbotts.com

ATTORNEYS FOR PATTERSON COMPANIES, INC.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2018, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580
ElectronicFilings@ftc.gov

The Honorable D. Michael Chappell Administrative Law Judge Federal Trade Commission 600 Pennsylvania Ave., NW, Rm. H-110 Washington, DC 20580

I further certify that I delivered via electronic mail a copy of the foregoing document to:

Lin Kahn (Attorney)

lkahn@ftc.gov

Ronnie Solomon (Attorney)

rsolomon@ftc.gov

Matthew D. Gold (Attorney)

mgold@ftc.gov

John Wiegand (Attorney)

jwiegand@ftc.gov

Erika Wodinsky (Attorney)

ewodinsky@ftc.gov

Boris Yankilovich (Attorney)

byankilovich@ftc.gov

Jeanine K. Balbach (Attorney)

jbalbach@ftc.gov

Thomas H. Brock (Attorney)

tbrock@ftc.gov

Jasmine Rosner (Attorney)

jrosner@ftc.gov

Federal Trade commission

901 Market St., Ste. 570

San Francisco, CA 94103

Phone Number: 415-848-5115

COMPLAINT COUNSEL

Howard Scher, Esq.
howard.scher@bipc.com
Kenneth Racowski, Esq.
kenneth.racowski@bipc.com
Carrie Amezcua, Esq.
carrie.amezcua@bipc.com
Buchanan Ingersoll & Rooney PC
50 S. 16<sup>th</sup> Street, Ste. 3200
Philadelphia, PA 19102

Craig A. Waldman, Esq.

<u>cwaldman@jonesday.com</u>
Benjamin M. Craven, Esq.

<u>bcraven@jonesday.com</u>
Ausra O. Deluard, Esq.

<u>adeluard@jonesday.com</u>
Jones Day

555 California Street, 26<sup>th</sup> Floor
San Francisco, CA 94104
T: 415-626-3939
F: 415-875-5700

Geoffrey D. Oliver, Esq.
Jones Day
51 Louisiana Avenue, N.W.
Washington, D.C. 20001-2113
T: 202-879-3939
F: 202-626-1700
gdoliver@jonesday.com

# Counsel for Respondent Benco Dental Supply Company

Timothy J. Muris, Esq. Sidley Austin LLP 1501 K Street, N.W. Washington, D.C. 20005 T: 202-736-8000 F: 202 736-8711 tmuris@sidley.com

Colin Kass, Esq.
<a href="mailto:ckass@proskauer.com">ckass@proskauer.com</a>
Adrian Fontecilla, Esq.
<a href="mailto:afontecilla@proskauer.com">afontecilla@proskauer.com</a>
Proskauer Rose LLP
1001 Pennsylvania Ave., NW, Ste. 600 South Washington, D.C. 20004-2533
T: 202-416-6800

F: 202-416-6899

John P. McDonald, Esq.
jpmcdonald@lockelord.com
Lauren Fincher, Esq.
lfincher@lockelord.com
Locke Lord LLP
2200 Ross Avenue, Ste. 2800
Dallas, TX 75201
T: 214-740-8000
F: 214-740-8800

Counsel for Respondent Henry Schein, Inc.

March 6, 2018

By: /s/ James J. Long
Attorney

### **CERTIFICATE OF ELECTRONIC FILING**

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed documents that are available for review by the parties and the adjudicator.

March 6, 2018	By: /s/ James J. Long
	Attorney

### Notice of Electronic Service

I hereby certify that on March 06, 2018, I filed an electronic copy of the foregoing Answer of Respondent Patterson Companies, Inc. to the FTC's Administrative Complaint, with:

D. Michael Chappell Chief Administrative Law Judge 600 Pennsylvania Ave., NW Suite 110 Washington, DC, 20580

Donald Clark 600 Pennsylvania Ave., NW Suite 172 Washington, DC, 20580

I hereby certify that on March 06, 2018, I served via E-Service an electronic copy of the foregoing Answer of Respondent Patterson Companies, Inc. to the FTC's Administrative Complaint, upon:

Lin Kahn Attorney Federal Trade Commission lkahn@ftc.gov Complaint

Ronnie Solomon Attorney Federal Trade Commission rsolomon@ftc.gov Complaint

Matthew D. Gold Attorney Federal Trade Commission mgold@ftc.gov Complaint

John Wiegand Attorney Federal Trade Commission jwiegand@ftc.gov Complaint

Erika Wodinsky Attorney Federal Trade Commission ewodinsky@ftc.gov Complaint

Boris Yankilovich Attorney Federal Trade Commission byankilovich@ftc.gov Complaint

Jeanine K. Balbach Attorney Federal Trade Commission jbalbach@ftc.gov

### Complaint

Thomas H. Brock Attorney Federal Trade Commission TBrock@ftc.gov Complaint

Jasmine Rosner Attorney Federal Trade Commission jrosner@ftc.gov Complaint

Howard Scher Attorney Buchanan Ingersoll & Rooney PC howard.scher@bipc.com Respondent

Kenneth Racowski Attorney Buchanan Ingersoll & Rooney PC kenneth.racowski@bipc.com Respondent

Carrie Amezcua Attorney Buchanan Ingersoll & Rooney PC carrie.amezcua@bipc.com Respondent

John McDonald Locke Lord LLP jpmcdonald@lockelord.com Respondent

Lauren Fincher Locke Lord LLP lfincher@lockelord.com Respondent

Colin Kass Proskauer Rose LLP ckass@proskauer.com Respondent

Adrian Fontecilla Associate Proskauer Rose LLP afontecilla@proskauer.com Respondent

Timothy Muris Sidley Austin LLP tmuris@sidley.com Respondent

Geoffrey D. Oliver Jones Day

gdoliver@jonesday.com Respondent

Craig A. Waldman Partner Jones Day cwaldman@jonesday.com Respondent

Benjamin M. Craven Jones Day bcraven@jonesday.com Respondent

Ausra O. Deluard Jones Day adeluard@jonesday.com Respondent

Joseph Ostoyich Partner Baker Botts L.L.P. joseph.ostoyich@bakerbotts.com Respondent

William Lavery Senior Associate Baker Botts L.L.P. william.lavery@bakerbotts.com Respondent

Andrew George Baker Botts L.L.P. andrew.george@bakerbotts.com Respondent

Jana Seidl Baker Botts L.L.P. jana.seidl@bakerbotts.com Respondent

Kristen Lloyd Associate Baker Botts L.L.P. Kristen.Lloyd@bakerbotts.com Respondent

James Long Attorney Briggs and Morgan, P.A. jlong@briggs.com Respondent

Jay Schlosser Attorney Briggs and Morgan, P.A. jschlosser@briggs.com Respondent

Scott Flaherty

Attorney Briggs and Morgan, P.A. sflaherty@briggs.com Respondent

Ruvin Jayasuriya Attorney Briggs and Morgan, P.A. rjayasuriya@briggs.com Respondent

William Fitzsimmons Attorney Briggs and Morgan, P.A. wfitzsimmons@briggs.com Respondent

> James Long Attorney